

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

RECEIVED

NOV 13 1996

Federal Communications Commission  
Office of Secretary

In the Matter of

Billed Party Preference  
for InterLATA 0 + Calls

CC Docket No. 92-77

DOCKET FILE COPY ORIGINAL

COMMENTS OF METROPOLITAN WASHINGTON  
AIRPORTS AUTHORITY

The Metropolitan Washington Airports Authority ("Airports Authority") submits these comments to respond to Question 4 propounded by the Common Carrier Bureau in its request for further comments on specific questions in this proceeding (DA 96-1695). As specified in the request for further comment, we set forth below a summary of the Airports Authority's position in response to this question and, thereafter, a statement of the Airports Authority interest in the matter and a development of the bases for its position.

SUMMARY

The Airports Authority urges the Commission not to impose a price disclosure requirement prior to call completion in all cases. Although we know of no studies of the matter, our experience in the operation of a significant number of payphones at Washington National and Dulles International Airports, confirms the contentions by commenters that such a universal requirement will significantly extend payphone usage time, add to the already congested use of

No. of Copies rec'd  
List ABCDE

024

payphones (particularly during peak travel periods) and cause needless consumer irritation and frustration in circumstances when rates do not exceed expected norms.

## DISCUSSION

The question posed is this:

4. Some commenters have claimed that price disclosure prior to call completion would create an unacceptable delay to consumers. Are there any studies that substantiate or dispute this contention and are those studies available? Are there any studies available that provide indications of consumer satisfaction or dissatisfaction with 0+ services provided in this fashion?

As a public body (created by interstate compact) charged with the operation of Washington National and Dulles International Airports for public purposes, the Airports Authority has a responsibility to meet the expectation of travelers for readily available, efficient and reliable payphone service. The Airports Authority serves the twelfth largest air passenger market in the United States with nearly 28 million passengers passing through the two airports annually. Thus, within the universe of premises owners, the Airports Authority certainly qualifies as a significant provider of payphone service to the public.

The Airports Authority's concern is that the imposition of a generally applicable price disclosure requirement in the form of a recorded message, as contemplated in Question 4, will interfere with its ability to meet the expectations

of the millions of travelers and visitors to the Washington airports that use payphone service annually without any countervailing consumer benefit.

The Airports Authority is not aware of any studies that attempt to measure the delay that price disclosure prior to call completion would create. However, the Commission itself has found that even relatively modest post-dial delay interferes with the efficient delivery of telecommunications services. See, e.g., Provision of Access for 800 Service, 4 FCC Rcd. 2824, 26-29 (1989). The interposition of an audible notice to consumers for on-demand call rating will, in itself, add to the length of time that consumers will be constrained to spend at payphones, and, if live operator intervention is required to respond to consumers who request price information about a particular call, delay in the completion of calls is likely to increase very substantially.

An increase in the average time that the typical consumer spends at a payphone will have significant adverse consequences for the consumer and the premises owner. Particularly during peak travel periods at both Washington National and Dulles, when usage of payphones is at or exceeds capacity, consumers will be constrained to reduce the number of calls they make or will be unable to get access to a payphone at all and, as in other cases involving post-dial delay, the call abandonment rate will go up. Id. Moreover, except in the most unusual of circumstances, call rating information will not yield informed consumer choice. At airports, payphone users do not have the time to comparatively shop for the lowest priced service provider. Thus, a system of on-demand call rating (even if otherwise technologically and economically feasible)

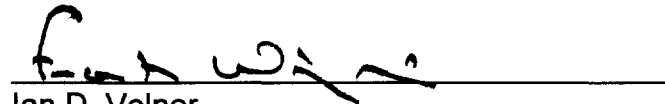
would serve, in most cases, merely to make payphone service less convenient and less efficient.

Nor is there much that a premises owner, like the Airports Authority, can meaningfully do to alleviate or offset these disadvantages. The proponents of price disclosure suggest that the problem of delay and congestion could be ameliorated by increasing the number of payphones available at a particular facility. This, however, ignores certain realities. Although payphones are certainly an essential service that the Airports Authority provides to the traveling public at Washington National and Dulles, airport users need and expect other services as well, such as restrooms, newsstands, food and beverages, rental car counters, and so on. The Airports Authority must continually balance competing demands for very limited space. Moreover, the problem that price disclosure is intended to address -- excessive payphone charges -- simply does not exist at Washington National or Dulles. As a matter of fundamental policy, the Airports Authority has not and would not accept a bid for payphone services at rates that exceed established industry norms.

For these reasons, the Airports Authority urges the Commission not to adopt a mandatory price disclosure requirement in connection with payphone service or, to limit such a requirement to those cases in which the rates being

charged exceed a benchmark and are, therefore, beyond normal consumer expectations.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ian D. Volner", is written over a horizontal line.

Ian D. Volner  
N. Frank Wiggins  
Venable, Baetjer, Howard & Civiletti, LLP  
1201 New York Avenue, N.W.  
Suite 1000  
Washington, DC 20005

Dated: November 13, 1996

Of counsel:

Naomi Klaus, Esq.  
Associate Counsel  
Metropolitan Washington Airports Authority  
44 Canal Center Plaza  
Alexandria, VA 22314